

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN ó SOUTHERN DIVISION

ALONZO BULLMAN, an individual,
JOEL CASTRO, an individual, and
NICOLE MOTYKA, an individual,
Plaintiffs,

Case No.: 2:16-cv-12581
Hon. Arthur J. Tarnow
Mag. Elizabeth A. Stafford

- vs -

CITY OF DETROIT, a Municipal Corporation,
MATTHEW BRAY, an individual,
IAN SEVERY, an individual,
CHERYL MUHAMMAD, an individual,
SAMUEL GALLOWAY, an individual,
NICO HURD, an individual,
JOHNNY FOX, an individual,
ALANNA MITCHELL, an individual, and
JOHN DOE, an individual,
Jointly and Severally,
Defendants.

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CITY OF DETROIT LAW DEPARTMENT
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**CITY OF DETROIT’S RESPONSE TO PLAINTIFFS’ FIRST MOTION TO COMPEL DISCOVERY OR IN
THE ALTERNATIVE TO SHOW CAUSE DEFENDANT CITY OF DETROIT**

NOW COMES Defendant, CITY OF DETROIT, by and through its attorney, Gregory B. Paddison, and for Defendant’s Response to Plaintiffs’ First Motion to Compel Discovery or in the alternative, to Show Cause Defendant, CITY OF DETROIT; Defendant relies on the statements of fact and law as stated in the accompanying Brief.

WHEREFORE, Defendant, CITY OF DETROIT, respectfully request that this Honorable Court deny

Plaintiffs' First Motion to Compel Discovery or in the alternative, to Show Cause Defendant, CITY OF DETROIT; award sanctions in favor of Defendant, CITY OF DETROIT, for having to respond to this frivolous Motion, and grant such other relief as this Court deems equitable and appropriate.

Respectfully submitted,
CITY OF DETROIT LAW DEPARTMENT

Dated: February 15, 2017

/s/ Gregory B. Paddison
Gregory B. Paddison (P75963)
Attorney for Defendants